

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**JOINT MOTION TO EXTEND  
PROGRESSION ORDER DEADLINES**

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COME NOW the Plaintiff, Jane Doe, and Defendants Board of Regents of the University of Nebraska and Tamiko Strickman (“Defendants”) by and through their undersigned counsel, and pursuant to the Court’s Civil Case Management Practices, hereby move the Court for an Order enlarging some of the Court’s deadlines issued on February 8, 2022, in its Case Progression Order [*Filing No. 31*] as follows:

1. The original deadline for Plaintiff to identify expert witnesses and completing expert disclosures for all experts expected to testify at trial (both retained experts and non-retained experts was August 18, 2022. The Parties conferred and agreed to extent this deadline to September 19, 2022, and the Plaintiff did designate experts on September 19, 2022.

2. The deadline for Defendants to identify expert witnesses and completing expert disclosures for all experts expected to testify at trial (both retained experts and non-retained experts) be extended from October 21, 2022, to January 20, 2022.

3. The deadline for completing written discovery under Rules 33, 34, and 36 of the Federal Rules of Civil Procedure be extended from September 30, 2022, to November 29, 2022.

4. The deadline to file any Motions to Compel discovery, written or oral, be extended from October 14, 2022, to December 13, 2022.

5. The deposition deadline be extended from December 30, 2022, to February 28, 2023.

6. The deadline for filing Motions to Exclude Testimony on Daubert and related grounds be extended from February 24, 2023, to April 25, 2023.

7. The deadline for filing dispositive motions be extended from February 24, 2023, to April 25, 2023.

8. The parties are working diligently to comply with all of the Court deadlines. The Parties are working diligently to schedule the depositions of the three experts designated by Plaintiff on September 19, 2022, and discover information with respect to their opinions. The extension of the above deadlines will allow the parties sufficient time to discover the facts at issue in this case. The enlargement of time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiff and Defendants respectfully request from this Court an extension of the deadlines as set forth herein.

Dated this 29<sup>th</sup> day of September 2022.

JANE DOE, Plaintiff.

By: /s/ Karen Truszkowski  
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BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA and  
TAMIKO STRICKMAN, Defendants.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

/s/ Lily Amare  
Lily Amare